

## **EXHIBIT 2**

## **EMAILS**

**Orbach, Joseph**

---

**From:** David Goldwasser <dgoldwasser@fiacp.com>  
**Sent:** Thursday, May 29, 2025 12:52 PM  
**To:** Orbach, Joseph; Mark Frankel; Yitz Taub; Yitz Taub  
**Cc:** Mandelsberg, Steven; Scott, Shannon (USTP)  
**Subject:** RE: RE:

RECEIVED FROM EXTERNAL SENDER - USE CAUTION

---

Mr. Orbach,

For clarity,

The payments are run through a processing company where we do not have access to their bank accounts. That is the reason we cannot provide them.

They provide us the reports which we sent to Mark and I believe to you.

We will work on the insurance certificates as we are aware and will make sure to address.

Mark is away and I am on my way overseas on a flight now.

We have the Holiday of Shavuot on Monday and Tuesday.

Other than that I am copying Mr. Taub from my office who will be happy to supply anything you need and even when Mark and I are around, he is available to you for ease of getting things you need.

Respectfully yours,

David Goldwasser  
FIA Capital Partners, LLC  
Cell #: 561-400-3640  
Fax #: 866-353-6360  
[dgoldwasser@fiacp.com](mailto:dgoldwasser@fiacp.com)  
[www.fiacp.com](http://www.fiacp.com)

---

**From:** Orbach, Joseph <JOrbach@thompsoncoburn.com>  
**Sent:** Thursday, May 29, 2025 9:41 AM  
**To:** Mark Frankel <mfrankel@bfklaw.com>  
**Cc:** Mandelsberg, Steven <SMandelsberg@thompsoncoburn.com>; Scott, Shannon (USTP) <Shannon.Scott2@usdoj.gov>; David Goldwasser <dgoldwasser@fiacp.com>  
**Subject:** RE:

Mark – to attempt to put the insurance issues to bed please provide us with the current certificate of insurance showing 44 Avonwood Road Credit LLC as the mortgagee, as well as proof of insurance from June 1<sup>st</sup> forward as our understanding is that the current policy expires on May 31<sup>st</sup>. Likewise, I don't really understand why it's an issue to provide us with the bank statements showing the deposits in and expenditures and my preference is not to be running to Court over this but the lack of response leaves us with little choice.

Joe

**Joseph Orbach**

[jorbach@thompsoncoburn.com](mailto:jorbach@thompsoncoburn.com)

P: 212 478 7396

F: 212 478 7400

**Thompson Coburn LLP**

488 Madison Avenue

New York, NY 10022

[www.thompsoncoburn.com](http://www.thompsoncoburn.com)

*Continuing the Hahn & Hessen Legacy*

---

**From:** Orbach, Joseph

**Sent:** Wednesday, May 28, 2025 11:47 AM

**To:** Mark Frankel <[mfrankel@bfklaw.com](mailto:mfrankel@bfklaw.com)>

**Cc:** Mandelsberg, Steven <[SMandelsberg@thompsoncoburn.com](mailto:SMandelsberg@thompsoncoburn.com)>; Scott, Shannon (USTP)

<[Shannon.Scott2@usdoj.gov](mailto:Shannon.Scott2@usdoj.gov)>; David Goldwasser <[dgoldwasser@fiacp.com](mailto:dgoldwasser@fiacp.com)>

**Subject:** RE:

When will you be providing us (and the Court and the UST) with the bank account statements showing the deposits that went in and the funds that went out? This is not a technical requirement but is our adequate protection as well as a Debtor's obligation in a bankruptcy proceeding. Our client does not accept a self-created "Income Statement" and "Statement of Cash Receipts and Disbursements". Either you and/or David have reviewed the actual bank account statements or I do not believe you could not make the submissions to the Court that were just made.

Additionally please clarify if the insurance is held in the name of Avon Place, LLC or if the insurance is held in name of the broker Avalon Risk Management. If the named insured is the broker please explain why they are listed as a named insured as well as why Debtor itself is not listed as a named insured. Additionally, if the Debtor is not a named insured on any policy please explain the statement "the Debtor maintains appropriate insurance coverage."

**Joseph Orbach**

[jorbach@thompsoncoburn.com](mailto:jorbach@thompsoncoburn.com)

P: 212 478 7396

F: 212 478 7400

**Thompson Coburn LLP**

488 Madison Avenue

New York, NY 10022

[www.thompsoncoburn.com](http://www.thompsoncoburn.com)

*Continuing the Hahn & Hessen Legacy*

---

**From:** Mark Frankel <[mfrankel@bfklaw.com](mailto:mfrankel@bfklaw.com)>

**Sent:** Wednesday, May 28, 2025 11:31 AM

**To:** NYEB\_JMMHearings <[JMM\\_Hearings@nyeb.uscourts.gov](mailto:JMM_Hearings@nyeb.uscourts.gov)>

**Cc:** Mandelsberg, Steven <[SMandelsberg@thompsoncoburn.com](mailto:SMandelsberg@thompsoncoburn.com)>; Scott, Shannon (USTP)

<[Shannon.Scott2@usdoj.gov](mailto:Shannon.Scott2@usdoj.gov)>; Orbach, Joseph <[JOrbach@thompsoncoburn.com](mailto:JOrbach@thompsoncoburn.com)>; David Goldwasser

[<dgoldwasser@fiacp.com>](mailto:dgoldwasser@fiacp.com)

**Subject:**

RECEIVED FROM EXTERNAL SENDER - USE CAUTION

Dear Judge Mazer Marino,

Please see attached response to Secured Creditor demand for emergency hearing.

Respectfully Submitted,

Mark Frankel

[1-25-41368-jmm Avon Place LLC](#)

Top of Form

**U.S. Bankruptcy Court**

**Eastern District of New York**

Notice of Electronic Filing

The following transaction was received from Mark A. Frankel entered on 5/28/2025 at 11:27 AM EDT and filed on 5/28/2025

**Case Name:** Avon Place LLC

**Case Number:** [1-25-41368-jmm](#)

**Document Number:** [57](#)

**Docket Text:**

Letter *in Response* Filed by Mark A. Frankel on behalf of Avon Place LLC (RE: related document(s)[56] Letter filed by Debtor Avon Place LLC) (Frankel, Mark)

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**Response Letter.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=979333796 [Date=5/28/2025] [FileNumber=27573430-0  
] [615e7245b1117941781dbd3b7fa895ee61b966f25fc590b62d8eb7ca8f5fb437834  
0aee9e5a8902044efc77256fbd6d6727a8f17e91462808efb35db68c91ba]]

**1-25-41368-jmm Notice will be electronically mailed to:**

Mark A. Frankel on behalf of Debtor Avon Place LLC

[mfrankel@bfklaw.com](mailto:mfrankel@bfklaw.com),

[22159@notices.nextchapterbk.com](mailto:22159@notices.nextchapterbk.com);[frankelmr74702@notify.bestcase.com](mailto:frankelmr74702@notify.bestcase.com);[1213477420@filings.docketbird.com](mailto:1213477420@filings.docketbird.com)

Alina Levi on behalf of Creditor Bankwell Bank

[alevi@polsinelli.com](mailto:alevi@polsinelli.com), [hdurant@polsinelli.com](mailto:hdurant@polsinelli.com);[tbackus@polsinelli.com](mailto:tbackus@polsinelli.com);[nydocketing@polsinelli.com](mailto:nydocketing@polsinelli.com)

Office of the United States Trustee

[USTPRegion02.BR.ECF@usdoj.gov](mailto:USTPRegion02.BR.ECF@usdoj.gov)

Joseph Orbach on behalf of Creditor 44 Avonwood Road Credit LLC

[jorbach@hahnessen.com](mailto:jorbach@hahnessen.com), [dreinhart@thompsoncoburn.com](mailto:dreinhart@thompsoncoburn.com), [smandelsberg@thompsoncoburn.com](mailto:smandelsberg@thompsoncoburn.com)

**1-25-41368-jmm Notice will not be electronically mailed to:**

An Anonymous Renter at Avon Place

,

Amy Arlin

,

Amy Arlin  
47 Avonwood Rd,  
Apt. 314  
Avon, CT 06001

Mary Foley  
47 Avonwood Road  
107  
Avon, CT 06001

John Hassan

,

Alex Kosovski  
44 Avonwood Road  
Unit 203  
Avon, CT 06001

Leon Kosovski

,

Thomas Preston  
47 Avonwood Road  
107  
Avon, CT 06001

Ricardo Ramirez  
48 Avonwood Rd  
Apt 209  
Avon, CT 06001  
Bottom of Form

---

CONFIDENTIALITY NOTE: This message and any attachments are from a law firm. They are solely for the use of the intended recipient and may contain privileged, confidential or other legally protected information. If you are not the intended recipient, please destroy all copies without reading or disclosing their contents and notify the sender of the error by reply e-mail.